

The Law Offices of



ONAODOWAN & DELINCE

VIA ECF

May 15, 2023

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

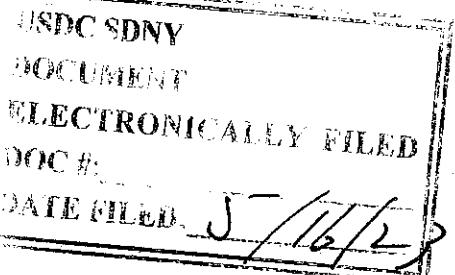
Esere J. Onaodowan, Esq.

eonaodowan@eocdlaw.com telephone: 718.427.3139

Christine E. Delince, Esq.

cdelince@eocdlaw.com telephone: 917.238.9332

MEMO ENDORSED



RE: *United States v. Danzel Mackins*, S2:21-Cr-424 (LAK)

Dear Judge Kaplan:

My name is Esere J. Onaodowan, and I and Karloff C. Commissiong represent Mr. Danzel Mackins in the above referenced matter. Pursuant to the Court's rules, we write to request permission to file a redacted version of our pre-trial motions in this matter. We are also requesting permission to file the Exhibits attached to our pretrial motions under seal. The motions contain sensitive information related to a Government cooperator. The Exhibits are also documents related to a Government cooperator. An unredacted version of the motion, a version of the motion with proposed redactions, and copies of the Exhibits have been emailed to the Court. Accordingly, we write to request permission to file a redacted version of pre-trial motions in this matter and to also file the Exhibits to our motion under seal.

Respectfully submitted,

Esere J. Onaodowan, Esq.  
Karloff C. Commissiong, Esq.

CC via ECF: AUSA Thomas John Wright

Application granted.

So Ordered:

Hon. Lewis A. Kaplan, U.S.D.J.

Dated: 5/16/2023